



August 11, 2010

816.001.01(128)

Ms. Mer Wiren, P.E.
Oregon Department of Environmental Quality
Northwest Regional Water Quality
2020 SW Fourth Avenue, Ste. 400
Portland, Oregon 97201

**Re: Comments on Applicant Review Draft of Permit No. 101613
and Fact Sheet/Permit Evaluation Report
Univar USA, Inc., Portland, Oregon**

Dear Ms Wiren:

On behalf of Univar USA, Inc. (Univar), PES Environmental, Inc. (PES) is submitting the comments below regarding the applicant review draft of Univar's National Pollutant Discharge Elimination System (NPDES) Permit No. 101613 and the associated Fact Sheet/Permit Evaluation Report (Fact Sheet), both dated July 15, 2010.

Comment #1 – Permit Schedules and B and Fact Sheet page 23 – Flow Limits and Measurement. Schedule A of the draft permit includes a limitation of flow based on a monthly average flow of 14 gallons per minute (gpm) during the critical flow period of June 1 through September 30 and 23 gpm during the remainder of the year. Schedule B of the permit requires continuous flow monitoring of the discharge with a note that defines "continuous flow measurement in gpm is defined as daily total gallons divided by 1440". This definition is for an average *daily* flow rate, whereas the limitation in Schedule A is a *monthly* average. Please clarify whether the flow limit is a monthly or daily average and clarify Note 2 for Schedule B if required.

Regarding the approach for gathering flow data, the current system currently measures flow continuously at each groundwater extraction well, and the flows from each well are added together to get the overall system flow rate. Is this an acceptable approach for measuring and documenting flow rates or must Univar install a flow meter on the discharge from the treatment system?

Comment #2 – Permit Schedule B, Fact Sheet pages 2 and 23 – Total phenols. Total phenols is included as a parameter to monitored and reported under the new permit. Because the data submitted by Univar during this and the previous renewal cycle do not indicate that total phenols is a compound of concern in the discharge from the treatment system, some explanation as to why it was included should be included in the Fact Sheet if not the permit itself.

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Comment #3 – Permit Schedule B and Fact Sheet page 23 – Composite Sampling. For the parameters listed at the bottom portion of Schedule B - total and inorganic arsenic, total and dissolved iron and manganese, cyanide, and total phenols - the permit calls composite samples to be collected. When in operation, the treatment system operates in a virtual steady state with no changes in the influent flow rates or contaminant concentrations that would occur over the timeframe of hours or a day. As a result, there is no benefit to collecting composite samples of this discharge. Any changes that occur take place gradually over a period of months or years which would be adequately characterized by collecting grab samples on the quarterly or semi-annual basis specified.

Comment #4 – Permit Schedule B and Fact Sheet page 23 – Duplicate parameters. There are several cases where parameters are duplicated in Schedule B. Cyanide is listed in the top portion of the table (parameters with discharge limitations listed in Schedule A) with a sampling frequency of monthly and also listed in the bottom portion (parameters with monitoring and reporting only) with semi-annual monitoring. It appears that cyanide should be deleted from the lower portion of the Schedule B.

Total and inorganic arsenic are listed twice in the bottom portion of Schedule B: once in the list of parameters with a semi-annual monitoring frequency and then separately with a monitoring frequency of quarterly. Total and inorganic arsenic should only be listed once in Schedule B. Also, because total arsenic is listed in Schedule A and has a "non-regulatory numeric benchmark", should total arsenic be listed in the upper portion of Schedule B with a quarterly monitoring frequency?

Comment #5 – Permit Schedule B and Fact Sheet page 23 – Quantitation Limits. The last column of Schedule B lists numeric quantitation limits for each parameter, and also references to Note 1. The first sentence of Note 1 states that approved analytical methods should be used "whenever possible with a Quantitation Limit (QL) that is lower than the permitted effluent limit." Which condition must Univar comply with - the numeric standards listed or the statement in Note 1? There are several cases where QLs could be well below the discharge limit but above the listed numeric QLs.

There appears to be an error with units for the numeric QL listed in Schedule B for cyanide. The Reasonable Potential Analysis Internal Management Directive lists a QL for cyanide of 5 µg/L, not 5 mg/L as shown.

Comment #6 – Permit Schedule D and Fact Sheet page 19 – Special Condition 3 of Schedule D describes the Arsenic Quantitation Plan. The second sentence identifies the objectives of the Arsenic Quantitation Plan, one of which is to "identify the source" of the arsenic present in groundwater. Can DEQ clarify what is intended by this source identification requirement?

Comment #7 - Fact Sheet page 4 - Sequestering Agent. In the first sentence of Section 2.3 on page 4, the Fact Sheet identifies the sequestering agent as "Aqua Mag". Univar has never

used this product and the current sequestering agent being used is "AN-310FG" manufactured by Analytix Technologies, LLC.

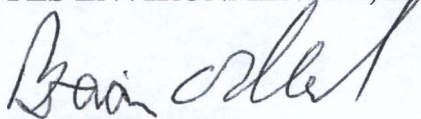
Comment #8 - Fact Sheet Page 6 - Process Wastewaters. In the second paragraph of Section 2.11, the Fact Sheet states that "There are no process wastewaters generated at the Univar Site." This statement should be clarified to state there are no process wastewaters that are discharged to surface water; Univar generates a number of process wastewaters that are discharged to sanitary sewer under a waste discharge permit.

Comment #9 - Fact Sheet pages 18 and 20. The Fact Sheet mentions in a few locations that the groundwater treatment system includes a particulate filter. Since approximately November 2004, Univar has not used the particulate filters under normal operating conditions because there were essentially no particulates in the influent and due to the tendency for the sequestering agent to clog the filter cartridges. The cartridges are replaced when the potential for particulates exist (e.g., after well redevelopment or line cleaning). The language in the fact sheet should be modified to reflect this operational approach.

Univar appreciates the opportunity to review and comment on the draft permit and appreciates DEQ's assistance with this permit renewal. If you have any questions, feel free to contact me at (206) 529-3980.

Very truly yours,

PES ENVIRONMENTAL, INC.



Brian O'Neal, P.E.
Associate Engineer

cc: George Sylvester, Univar USA, Inc.
Rob Matteson, Univar USA, Inc.
Holly Arrigoni, U.S. EPA Region 10